



1 JOHNATHAN J. DAMEN, an Individual and  
2 attorney at Routh Crabtree Olden PS; JEFF  
3 ROMIS AKA JEFFREY L. ROMIG, an  
individual; PATRICIA J. KRAUSE, an  
individual; GREENPOINT MORTGAGE  
4 FUNDING, INC., a mortgage company form  
unknown; SERVICELINK AKA  
5 SERVICELINK, LLC a business organization  
form unknown; LSI TITLE AGENCY INC., a  
title agency form unknown; CHICAGO TITLE  
COMPANY, a title company form unknown;  
6 FIDELITY NATIONAL DEFAULT  
SOLUTIONS, INC., a company form  
7 unknown; NATIONWIDE TITLE CLEARING,  
a title company form unknown; AMANDA  
8 ROSE JONES, an individual and Assistant  
Secretary for MERS Inc., KRISTOPHER  
9 JAMES SANDBERG, a Wells Fargo employee;  
and DOES 1 THROUGH 1000, INCLUSIVE,  
10

11 Defendants.

12 Pursuant to Federal Rule of Civil Procedure 6(b), Defendants, OCWEN FINANCIAL CORP.,  
13 MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., MERSCORP HOLDINGS INC.  
14 hereby request an order granting additional time, up to and including March 1, 2017, to file a responsive  
15 pleading to Plaintiff's pro per 75 page, 236 paragraph Complaint. This is the first request for an extension  
16 of this deadline.  
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1 This Motion is based upon the attached points and authorities, the pleadings and papers on file  
2 herein and any argument of counsel that may be considered at the hearing on this Motion by the Court.

3 DATED this 27<sup>th</sup> day of January, 2017.

4 WRIGHT, FINLAY & ZAK, LLP  
5

6 /s/ Yanxiong Li, Esq.  
7 Dana Jonathon Nitz, Esq.  
8 Nevada Bar No. 0050  
9 Natalie C. Lehman, Esq.  
Nevada Bar No. 12995  
YanXiong Li, Esq.  
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7785 W. Sahara Avenue, Suite 200  
Las Vegas, Nevada 89117  
11 *Attorneys for OCWEN FINANCIAL CORP.,*  
*MORTGAGE ELECTRONIC*  
*REGISTRATION SYSTEMS, INC.,*  
*MERSCORP HOLDINGS INC.*

13 **POINTS AND AUTHORITIES**  
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15 Plaintiff commenced this lawsuit on December 16, 2016, by filing his pro per Complaint (ECF  
16 No. 1). The Complaint spans 75 pages, asserts 16 causes of action, and includes 236 separate factual  
17 allegations that require individual response. The Complaint identifies as defendants: Ocwen Financial  
18 Corp. ("Ocwen"), Mortgage Electronic Registration Systems, Inc. ("MERS"), MERSCorp Holdings Inc.  
19 ("Merscorp"), among the 26 separate individual and entity defendants named.  
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21 Defendant Ocwen was served with the Complaint on January 11, 2017, making its deadline to  
22 respond to the Complaint February 1, 2017. It is currently unclear when or even if all the other  
23 defendants have been served. Defendant Ocwen first retained counsel on January 24, 2017 and will  
24 defend on behalf of all named defendants pursuant to its pre-existing agreements with the various  
25 defendants. By this Motion, all named Defendants jointly request an extension of time to respond up to  
26 and including March 1, 2017. This request is being made pursuant to F.R.C.P. 6(b)(1)(A) as the time  
27 period to respond to the Complaint has not yet passed for any of the Defendants.  
28

1 Good cause exists to extend the time to respond to the pro per Complaint because of the length of  
2 the 75 page pleading, the complexity presented in its 16 causes of action, and the investigation and  
3 research necessary to respond to the separate 236 paragraphs of allegations. The requested time is needed  
4 to investigate the facts and analyze the applicable law in order to prepare a response. Moreover, multiple  
5 defendants will need to review and approve the response before it can be filed. Defendants submit that  
6 the additional time requested is reasonable, particularly in light of the above listed factors.  
7

8 **CONCLUSION**

9 For these reasons, Defendants respectfully request an extension of the time to respond to  
10 Plaintiffs' Complaint until March 1, 2017.

11 DATED this 27<sup>th</sup> day of January, 2017.

12 WRIGHT, FINLAY & ZAK, LLP

13  
14 /s/ Yanxiong Li, Esq.  
15 Dana Jonathon Nitz, Esq.  
16 Nevada Bar No. 0050  
17 Natalie C. Lehman, Esq.  
18 Nevada Bar No. 12995  
19 YanXiong Li, Esq.  
20 Nevada Bar No. 12807  
21 7785 W. Sahara Avenue, Suite 200  
22 Las Vegas, Nevada 89117  
23 *Attorneys for OCWEN FINANCIAL CORP.,*  
24 *MORTGAGE ELECTRONIC REGISTRATION*  
*SYSTEMS, INC., MERSCORP HOLDINGS INC.*

25  
26 IT IS SO ORDERED this 2nd day  
27 of February, 2017.  
28

  
26 Peggy A. Leen  
27 United States Magistrate Judge  
28

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I electronically served the foregoing **MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** was made on the 27<sup>th</sup> day of January, 2017, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing and/or by depositing a true and correct copy of the same in the U.S. Mail addressed as follows:

Salma Agha-Khan, M.D.  
3751 Motor Ave., #34272  
Los Angeles, CA 90034

An Employee of WRIGHT FINLAY & ZAK, LLP